

## Chapter I

### INTRODUCTION: PURPOSE OF AND NEED FOR THE ACTION



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## I. Introduction

### Proposed Action

The Bureau of Reclamation (Reclamation) proposes to operate Navajo Dam and Reservoir to implement Endangered Species Act (ESA)-related flow recommendations on the San Juan River, or a reasonable alternative<sup>1</sup> to those recommendations, in a manner which allows for both current and certain future water depletions<sup>2</sup> to proceed.

This change in reservoir operation would assist in conserving endangered fish in the San Juan River downstream from Farmington, New Mexico, and in enabling water development to proceed in the San Juan River Basin (Basin) in compliance with applicable laws, compacts, court decrees, and American Indian (Indian) trust responsibilities. To accomplish this action, Reclamation would continue to operate Navajo Dam to meet the authorized project purposes while modifying reservoir release patterns to meet flow recommendations designed to maintain or improve habitat for the razorback sucker and Colorado pikeminnow (formerly Colorado squawfish).

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<sup>1</sup> A reasonable alternative may be determined through consultation with the Fish and Wildlife Service (Service) under Section 7 of the ESA. All Federal agencies are required to consult with the Service for Federal actions that may affect threatened or endangered species or their designated critical habitat.

<sup>2</sup> Those which have obtained appropriate environmental compliance but are not yet implemented.

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This Navajo Reservoir Operations Draft Environmental Impact Statement (DEIS) describes and analyzes environmental effects resulting from the proposed operational changes to Navajo Dam and Reservoir. The DEIS has been prepared according to provisions of the National Environmental Policy Act of 1969 (NEPA) and other laws and mandates listed at the end of this chapter. The general EIS process is shown in figure I-1.

## **Scope of the Proposed Action**

The effects of the proposed action would encompass Navajo Dam and Reservoir and the surrounding area in southwest Colorado and northwest New Mexico and the San Juan River downstream to Lake Powell near the Utah/ Arizona border. Navajo Dam is approximately 38 miles northeast of Farmington, New Mexico, and about 77 miles southeast of Durango, Colorado. Other communities in the area include Bloomfield and Shiprock, New Mexico (the latter on the Navajo Nation Reservation), and Bluff and Mexican Hat, Utah.

It has been suggested that Reclamation treat certain authorized water projects/depletions—those which have a Federal connection but which have not obtained appropriate environmental compliance—within the scope of this DEIS. Reclamation has not adopted this suggestion. The only action which Reclamation is analyzing is the implementation of the Flow Recommendations. Nothing in this document precludes sponsors of future water projects from obtaining appropriate environmental compliance and developing their projects.

## **Purpose of and Need for the Proposed Action**

The purpose of modifying the operations of Navajo Dam and Reservoir is to provide sufficient releases of water at times, quantities, and durations necessary to conserve the two endangered fish species and their designated critical habitat as recommended in the San Juan River Basin Recovery Implementation Program (SJRBRIP)<sup>3</sup> *Flow Recommendations for the San Juan River* (Flow Recommendations)(Holden, 1999), and subject to concurrence by the Fish and Wildlife Service (Service) through formal ESA consultation. Reclamation would maintain the authorized purposes of the Navajo Unit (Navajo Dam and Reservoir),

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<sup>3</sup> The SJRBRIP is a major cooperative effort among entities interested in the goals of endangered fish recovery and in proceeding with water development in the Basin. In addition to Reclamation, participants include the Service; Bureau of Indian Affairs; Bureau of Land Management; Southern Ute Indian and Ute Mountain Ute Tribes; Navajo and Jicarilla Apache Nations; water management interests; and the States of Colorado, Utah, and New Mexico. The SJRBRIP consists of three committees dealing with coordination, biology, and hydrology.

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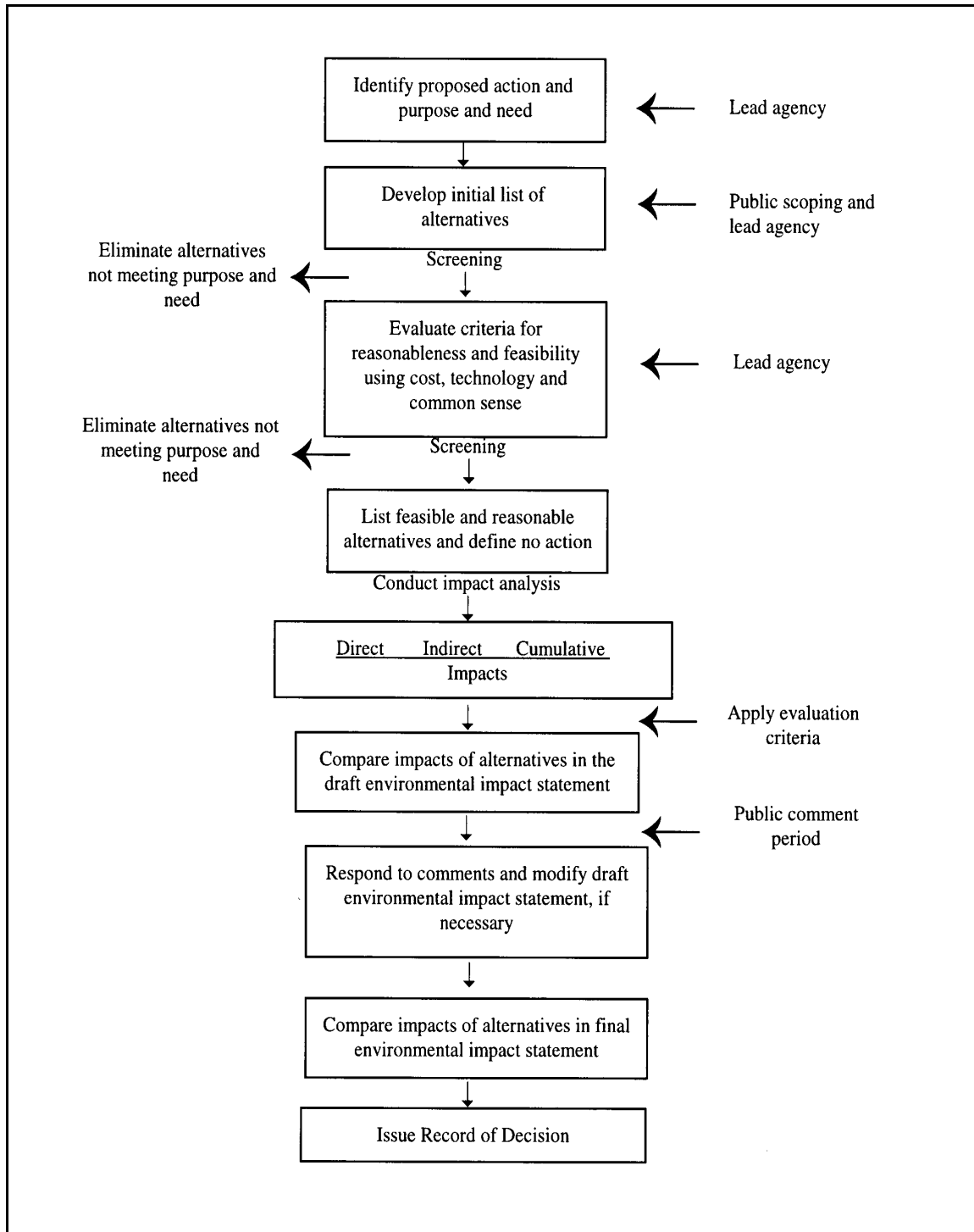


Figure I-1. – General NEPA process.

which include enabling future water development to proceed in the Basin in compliance with applicable laws, compacts, decrees, and Indian trust responsibilities.

The need for a plan to modify operations has resulted from previous ESA consultations with the Service on other Basin projects that affect flows in the San Juan River. Reclamation is required to comply with the ESA for operation of the facilities of the Colorado River Storage Project (CRSP), which include Navajo Dam. The operation of Navajo Dam is a key element of the SJRBIP.

## II. Background

### Initial Operation

After completion of the Navajo Unit in 1962, criteria governing releases of water from the dam focused primarily on meeting irrigation needs, providing flood control, maintaining stable river flows, and providing a recreation pool in Navajo Reservoir. However, native<sup>4</sup> fish populations and their habitat have been adversely affected or modified in part by the construction and subsequent operation of Navajo Dam. Also, Lake Powell's inundation of approximately 30 miles of the lower San Juan River has had significant impact on native fish habitat, as well. Some of the other factors adversely affecting these native fish include the introduction of non-native<sup>5</sup> fish, the past removal of native fish to create a more desirable recreation fishery, contribution of diversion structures, and instream channel modifications. Operating the dam under its historic operating criteria would continue the adverse flow effects. However, over the last decade, the criteria and associated pattern for releasing water from the dam were modified to accommodate endangered fish research and recovery efforts in the San Juan River due to ESA consultations.<sup>6</sup>

### ESA Consultations

The catalyst for changing dam operation criteria came about from formal consultation with the Service on proposed construction of the Animas-La Plata Project (ALP Project).<sup>7</sup> On

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<sup>4</sup> Fish that are indigenous to the Colorado River Basin, of which the San Juan River Basin is a component.

<sup>5</sup> Fish that evolved in basins outside of the Colorado River Basin but were purposely or accidentally introduced to this Basin.

<sup>6</sup> Consultation under the ESA is required of Federal agencies for existing and new projects and programs to determine effects on endangered species.

<sup>7</sup> Reclamation's ALP Project in southwest Colorado/northwest New Mexico will provide municipal and industrial (M&I) water from the Animas River (largest tributary to the San Juan River) to Colorado Ute Tribes to settle their water right claims, and M&I water for non-Indians. It is a water diversion project that includes a reservoir near Durango, Colorado.

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May 7, 1990, the Service issued a draft biological opinion concluding that the ALP Project would jeopardize the continued existence of the Colorado pikeminnow, and no reasonable and prudent alternative (RPA)<sup>8</sup> to avoid jeopardy was identified at the time. New hydrologic investigations suggested that the flexibility which existed in the operation of Navajo Dam could help offset the negative impacts of operating the ALP Project. For example, reducing releases during most months could make water available to increase spring peak flows, returning the San Juan River downstream of Farmington to a more natural hydrograph (flow conditions).



The San Juan River below Navajo Dam.

After requesting formal consultation under the ESA on the operation of Navajo Dam, Reclamation committed to operate the dam in concert with ongoing research to determine hydrologic conditions beneficial to endangered fish and to operate the dam in a manner most consistent with endangered fish recovery for the life of the dam.<sup>9</sup> The Service concurred with Reclamation's request that the consultation process be initiated and the overall consultation period for the operation of the dam be extended while 7 years of planned research on the needs of the two listed endangered fishes in the San Juan River were conducted.<sup>10</sup>

On October 25, 1991, the ALP Project received a biological opinion from the Service with an RPA calling for Reclamation to operate Navajo Dam to mimic the natural hydrograph. Since specifics of how to mimic a natural hydrograph were not quantified for the San Juan River, the RPA included a commitment to contribute funding for approximately 7 years of research. Under the direction of the SJRBRIP, the research was to determine flows that would benefit the endangered Colorado pikeminnow and the razorback sucker (a candidate species that achieved endangered status on October 23, 1991). As a result of the commitment by Reclamation to carry out the terms of the biological opinion, the Service found that the ALP Project could exercise an average annual depletion allowance of 57,100 acre-feet per year from the San Juan River without jeopardizing the endangered fish.

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<sup>8</sup> An alternative that avoids jeopardizing the existence of a species and also is reasonable to implement.

<sup>9</sup> Memorandum to the Service, July 30, 1991.

<sup>10</sup> Memorandum to Reclamation, August 19, 1991.

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On February 26, 1996, another biological opinion was issued by the Service for the ALP Project in relation to newly designated critical habitat and to include the newly listed razorback sucker, placing further restrictions on the allowable depletion for the project. The opinion concluded that a total depletion of 57,100 acre-feet per year could not be exceeded in any one year until all the elements of the RPA were completed and/or implemented. This limitation was modified in case Reclamation lowered winter releases from Navajo Dam to 300 cubic feet per second (cfs) to provide extra flexibility in releases (described in the “Hydrology” section of the 1991 biological opinion). If that condition existed, then the ALP Project could maintain an average annual depletion of 57,100 acre-feet.

A June 2000 biological opinion was prepared in response to a downsized ALP Project. It superseded previous opinions and included the following conservation measure<sup>11</sup>—the operation of Navajo Reservoir would mimic the natural hydrograph of the San Juan River to benefit endangered fish species and their critical habitat. Mimicry of the natural hydrograph would be achieved by operating Navajo Dam to follow the Flow Recommendations and would be subject to completion of the Navajo Reservoir Operations EIS and Record of Decision.

Biological opinions for other water projects depend on the re-operation of Navajo Reservoir—for example, the Navajo Indian Irrigation Project (NIIP), a Public Service of New Mexico (PNM) water contract with the Jicarilla Apache Nation, Florida and Mancos water contracts, and 3,000 acre-feet of unspecified minor depletions from Navajo Reservoir.

## **San Juan River Basin Recovery Implementation Program**

The SJRBRIP was initiated in 1992 with two goals:

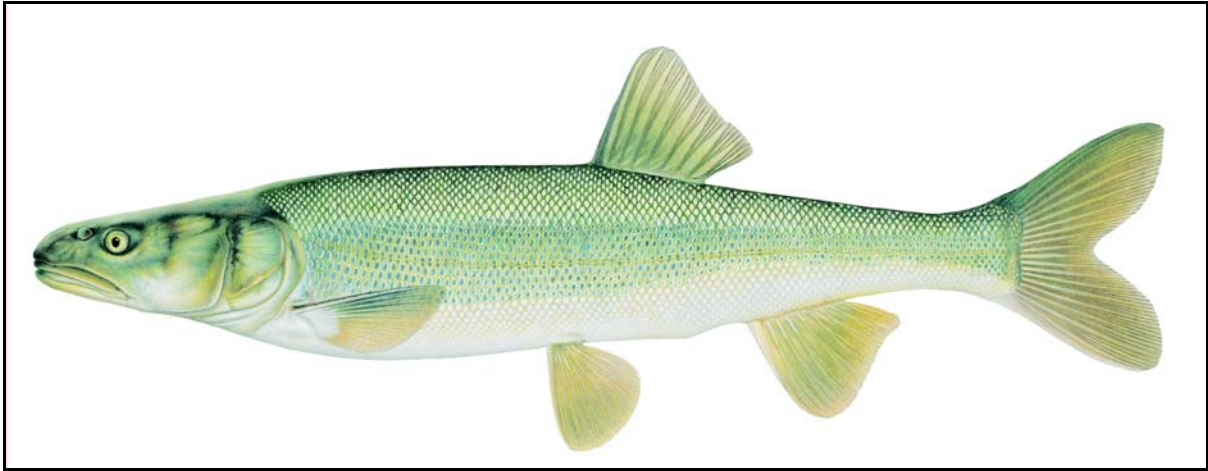
- ☐ To conserve populations of Colorado pikeminnow and razorback sucker (figure I-2) in the Basin, consistent with the recovery goals established under the ESA.
- ☐ To proceed with water development in the Basin in compliance with Federal and State laws, interstate compacts, court decrees, and Federal trust responsibilities to the Southern Ute Indian and Ute Mountain Ute Tribes and the Jicarilla Apache and Navajo Nations.

The SJRBRIP has identified factors limiting the recovery of endangered fish and is implementing actions to meet the ecological needs of the two endangered fish species.

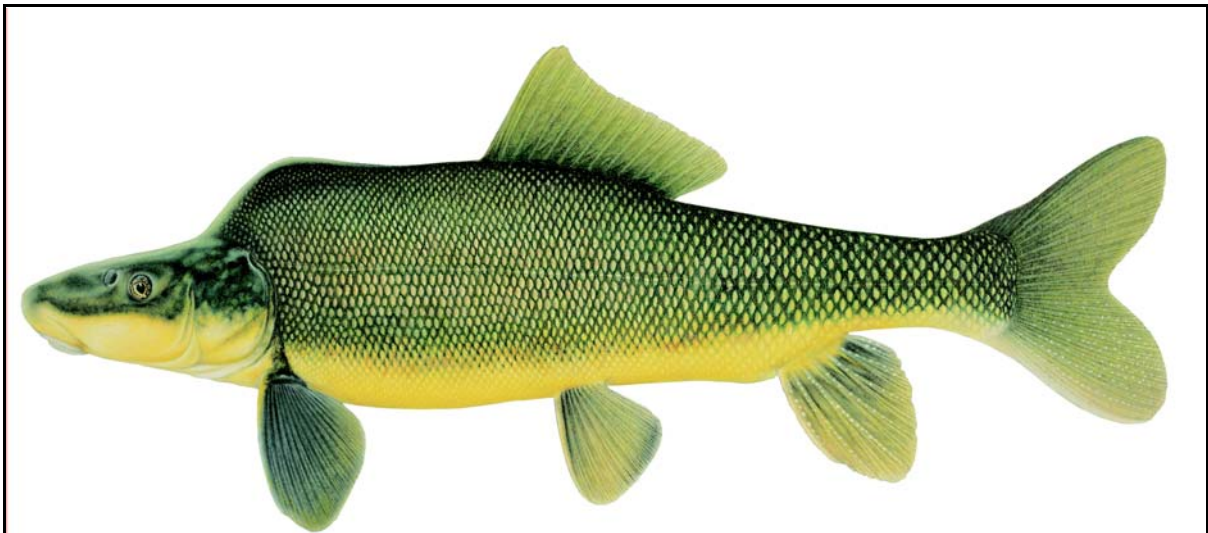
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<sup>11</sup> Actions to benefit or promote the recovery of threatened or endangered species that are part of the proposed action.

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Colorado pikeminnow



Razorback sucker

Figure I-2.—Colorado pikeminnow and razorback sucker.  
(Illustrations copywritten by Joseph R. Tomelleri)

Ongoing and proposed activities recommended by the SJRBRIP include re-regulation of releases from Navajo Dam to better meet species needs, control of non-native fish, augmentation of endangered fish populations, and identification and removal of fish-passage barriers.

Under the direction of the SJRBRIP, Navajo Dam test releases were conducted and evaluated from 1992-1998. At the completion of the research period, the SJRBRIP completed the Flow Recommendations. The recommendations include suggested Navajo Dam operating rules for various hydrologic conditions and levels of water development in the Basin. Applying these rules would allow the Flow Recommendations to be met and water development to proceed consistent with the ESA and other applicable laws. Additional depletion in the Basin is to increase above the level set in the 1991 ALP Project biological opinion. Future water development is discussed in chapter II.

The suggested operating rules define conditions for mimicking a natural hydrograph in terms of magnitude, duration, and frequency of flows in the river downstream from Farmington. Such mimicry is designed to meet the river conditions required to develop and maintain habitat for the endangered fish and to provide the necessary hydrologic conditions for the various life stages of the endangered and other native fishes. For example, high spring flows create conditions for backwater formation while low flows help maintain backwaters which provide important nursery habitat. In addition, high flows clean cobble bars that are used for Colorado pikeminnow spawning (Holden, 1999). These are the recommendations that Reclamation is proposing to meet by modifying the operations of Navajo Dam. The Flow Recommendations are subject to periodic review and modification through the SJRBRIP based on new information obtained by the program.

The Flow Recommendations are based on knowledge available as of 1998. They include a recommendation for an adaptive management process based on new information as it becomes available. It is possible that the Flow Recommendations will be modified in the future based on new information, and that these modifications may further affect operation of Navajo Dam. Any re-operation outside of the release range of the alternative selected as a result of the final EIS (FEIS) would be subject to further NEPA compliance, including public review and comment.

## **San Juan River Channel Capacity**

Representatives from the Corps of Engineers (Corps) and Reclamation observed the San Juan River channel in late May 1998 to evaluate the river channel with 5,000 cfs flowing and to determine if additional flow could be routed without causing major downstream damage. The analysis was requested of Reclamation by the SJRBRIP to help determine long-term flow recommendations.

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The results showed that any increase in flow above 5,000 cfs may endanger existing structures along the river. Other impacts identified included channel bank sloughing and erosion, septic system problems, and increased danger to the public resulting from high water flows. (Additional information is available in *Summary Report, Channel Capacity below Navajo Dam*, Reclamation/Corps of Engineers, 1998.)

As a result of the above findings, the Corps notified Reclamation<sup>12</sup> that the current channel capacity for the San Juan River from Navajo Dam to Farmington is 5,000 cfs.

### III. Issues and Concerns

Issues raised in the public meetings held in 1999 and in written comments and internal scoping are discussed in chapter V. Briefly, the major concerns centered on possible effects to or the occurrence of the following: endangered species, aesthetics and land use, wetland/riparian vegetation, fish and wildlife, flow regimes, water rights, water quality, flooding of lands and facilities, damage to irrigation and water supply facilities, bank erosion, cultural resources, Indian trust assets, environmental justice, social and economic well-being, and recreation.

### IV. Cooperating Agencies

Coordination and consultation with cooperating Federal, State, and local agencies and Tribes and Tribal nations were conducted concurrently with the development of alternatives and preparation of the DEIS and are described in greater detail in chapter V. Federal agencies and local, State, and Tribal governments with appropriate expertise or jurisdiction were invited to participate in the NEPA process as cooperating agencies. They include:

- Bureau of Indian Affairs, Navajo Indian Irrigation Project
- Bureau of Indian Affairs, Southwest Region, Albuquerque, New Mexico
- Bureau of Land Management, Monticello, Utah
- City of Farmington, Farmington, New Mexico
- Corps of Engineers, Albuquerque, New Mexico
- Colorado Water Conservation Board, Denver, Colorado
- Environmental Protection Agency, Dallas, Texas
- Federal Energy Regulatory Commission, San Francisco, California
- Fish and Wildlife Service, Albuquerque, New Mexico
- Jicarilla Apache Nation, New Mexico
- National Park Service, Glen Canyon National Recreation Area, Page, Arizona

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<sup>12</sup> Letter to Reclamation, December 5, 2001.

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New Mexico Department of Game and Fish, Santa Fe, New Mexico  
New Mexico Interstate Stream Commission, Santa Fe, New Mexico  
San Juan Water Commission, Farmington, New Mexico  
Southern Ute Indian Tribe, Colorado  
Southwestern Water Conservation District, Durango, Colorado  
The Navajo Nation, Arizona, New Mexico, and Utah  
Ute Mountain Ute Tribe, Colorado and New Mexico

## V. Connected and Related Actions

Navajo Reservoir operations constitute a connected action to other water resource activities in the Basin, such as the ALP Project and the NIIP. This connection stems from: (1) past ESA consultations which relied upon the SJRBRIP and re-operation of Navajo Reservoir to avoid jeopardy to the endangered species in question; (2) Flow Recommendations developed and approved by the SJRBRIP; and (3) Reclamation's previous commitment to operate Navajo Reservoir for the benefit of endangered fish in the Basin.

On March 4, 1998, final biological opinions were issued on the Mancos Water Conservancy District's irrigation and municipal and industrial (M&I) water conversion and on the Florida Project's water sales contracts. The biological opinions state:

To avoid jeopardy to the Colorado pikeminnow and razorback sucker. . .  
Reclamation, in consultation with the Service, will re-operate Navajo Dam to mimic the natural hydrograph of the San Juan River, as agreed to as a result of consultation on the ALP Project.

The Bureau of Indian Affairs (BIA) biological assessment for the completion of NIIP includes a commitment by the BIA for Reclamation to operate Navajo Dam to meet the Flow Recommendations.<sup>13</sup> The change in operation of Navajo Dam is not dependent upon completion of ESA consultations for the ALP Project and NIIP; however, full completion and operation of these projects is dependent upon the re-operation of Navajo Dam to meet the Flow Recommendations.

Other proposed actions related to the operation of Navajo Dam include the following:

- ☐ Actions to implement some of the Jicarilla Apache Nation water rights settlement and related water service contracts

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<sup>13</sup> Letter of July 14, 1999, from the Service to Reclamation.

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- ☐ Actions to develop some of the water rights established in the 1986 Colorado Ute Indian Water Rights Settlement Agreement and the Colorado Ute Settlement Act, Amendments of 2000
- ☐ The Navajo-Gallup Water Supply Project<sup>14</sup>
- ☐ The exercise of other, presently unquantified Indian or Federal water rights
- ☐ Unspecified future non-Indian water development

## VI. Responsibilities and Compliance

The Navajo Unit is one of four key features of the CRSP which was constructed to provide for the comprehensive development of the water resources in the Upper Colorado River Basin. The Navajo Unit is operated in accordance with the CRSP Act and applicable Reclamation and other Federal laws. Authorities and functions of the Navajo Unit are shown in table I-1.

The United States has ESA, Tribal, and other responsibilities in the Basin associated with operation of the Navajo Unit. The laws and policies listed below and table I-1 summarize these responsibilities and are in addition to the authorized purposes of the Navajo Unit.

### Environmental

Clean Air Act (42 USC 7401 et seq.)

Clean Water Act of 1972 (33 USC 1251 et seq.)

Endangered Species Act of 1973 (16 USC 1532 et seq.)

Fish and Wildlife Coordination Act (48 Stat., as amended; 16 USC 661)

National Environmental Policy Act of 1969 (42 USC 4321 et seq.)

Wild and Scenic Rivers Act of 1968 (16 USC 1532 et seq.)

Executive Order 11988, Floodplain Management, 1977

Executive Order 11990, Protection of Wetlands, 1977

Executive Order 11991, Protection and Enhancement of Environmental Quality, 1977

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<sup>14</sup> A project that would provide M&I water to Gallup, New Mexico, and parts of the Navajo Nation. Construction has not been authorized.

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Table I-1.—Various authorities under which the Navajo Unit is operated<sup>1</sup>

Function	Law
Municipal, industrial and other beneficial purposes	1939 Reclamation Project Act (Public Law [P.L.] 76-260), Colorado River Storage Project Act (CRSP)—P.L. 84-485, 1962 Navajo Indian Irrigation Project and San Juan Chama Act, and 1968 Colorado River Basin Project Act (CRBP)—P.L. 90-537
Flood control	1939 Reclamation Project Act, 1956 CRSP Act, 1968 CRBP Act, and Flood Control Act of 1944
Improving navigation	1939 Reclamation Project Act, 1956 CRSP Act, and 1968 CRBP Act
Regulating the flow of the Colorado River	1956 CRSP Act and 1968 CRBP Act
Reclamation of arid lands	1956 CRSP Act, 1962 Navajo Indian Irrigation Project and San Juan Chama Act, and 1968 CRBP Act
Generation and sale of electric power	1956 CRSP Act and 1968 CRBP Act
Fish and wildlife	Section 8 of the 1956 CRSP Act; 1965 Federal Water Project Recreation Act (P.L. 89-72); 1958 Fish and Wildlife Coordination Act (P.L. 85-624); 1962 Navajo Indian Irrigation Project and San Juan Chama Act, and 1968 CRBP Act
Recreation	1962 Navajo Indian Irrigation Project and San Juan Chama Act, 1965 Federal Water Project Recreation Act (P.L. 89-72), and 1968 CRBP Act
Improving water quality	1962 Navajo Indian Irrigation Project and San Juan Chama Act, 1974 Colorado River Basin Salinity Control Act (P.L. 93-320), and 1968 CRBP Act
Tribal water rights	1962 Navajo Indian Irrigation Project and San Juan Chama Act and Jicarilla Apache Tribe Water Rights Settlement Act of October 23, 1992 (P.L. 102-441)

<sup>1</sup> The federally authorized purposes are described in Section 1 of the CRSP.

## Cultural Preservation

Archeological and Historic Preservation Act (16 USC 469 et seq.)

Archeological Resources Protection Act of 1979 (16 USC 470 et seq.)

Historic Sites, Buildings, and Antiquities Act (16 USC 461 et seq.)

National Historic Preservation Act (16 USC 470 et seq.)

Executive Order 11593, Protection and Enhancement of the Cultural Environment,  
1971

## American Indian

American Indian Religious Freedom Act of 1978, as amended (42 USC 1996)  
Native American Graves Protection and Repatriation Act of 1990 (25 USC 3001  
et seq.)  
Religious Freedom Restoration Act of 1993 (Public Law 103-141)  
Executive Order 12007 (Indian Sacred Sites)  
Secretarial Orders 3175, 3206, and 3215 on Indian Trust Assets

## Other

Executive Order 12898, Environmental Justice in Minority Populations and Low  
Income Populations, 1994  
Reclamation Reform Act of 1982 (Public Law 97-293, title II, 96 Stat.1263)  
Applicable State and Tribal laws implementing the Federal laws identified above

In addition, on October 29, 1996, Reclamation agreed, under terms of a legal settlement with the San Juan Fly Fishing Federation and New Mexico Chapter of Trout Unlimited, to prepare an environmental impact statement before permanently reducing future minimum flows below 500 cfs.

## VII. Document Review

Reclamation's Notice of Intent to prepare this DEIS was published in the *Federal Register* on October 1, 1999. Scoping meetings were conducted on November 3, 4, 9, and 10, 1999, in Farmington, New Mexico; Durango, Colorado; Albuquerque, New Mexico; and Pagosa Springs, Colorado, respectively. The written responses were reviewed by Reclamation and incorporated when they were within the scope of the Federal action.

The preliminary draft of this DEIS was circulated to cooperating agencies for review. A Notice of Availability (NOA) of the DEIS for a 60-day public review and comment period was published in the *Federal Register*, which included an announcement of public hearings to be held from 6 to 9 p.m. at the following locations:

October 1, 2002	Farmington, New Mexico, Civic Center
October 2, 2002	Durango, Colorado, Doubletree Hotel,
October 3, 2002	Bluff, Utah, Community Center

During the public review and comment period, oral testimony and written comments will be received. Comments should be received by Reclamation by November 4, 2002. Written responses to comments will be published in the FEIS. An NOA will be published in the *Federal Register* announcing the availability of the FEIS. Release of a Record of Decision will conclude the NEPA process.

Volumes I and II of this document are available at Reclamation's Western Colorado Area Offices in Durango and Grand Junction, Colorado; the Upper Colorado Regional Office, Salt Lake City, Utah; and Technical Services Center, Denver, Colorado; and at area public libraries and at other locations noted in chapter V. Volume I is also available at [www.uc.usbr.gov](http://www.uc.usbr.gov) (select Environmental Programs, then Navajo Dam and Reservoir site). A distribution of documents will also be made to those on the DEIS list in chapter V.

## VIII. Document Organization

A description of the proposed action and alternatives, an analysis of resources potentially impacted, an assessment of those impacts, and an evaluation of options to avoid or mitigate impacts are included in the following Volume I chapters.

- ☐ List of acronyms and abbreviations
  - ☐ Executive Summary
  - ☐ *Chapter I, Introduction, Purpose of and Need for the Action*, discusses the purpose of and need for the proposed action, objectives of the DEIS, key issues, legal and other requirements, and the review process.
  - ☐ *Chapter II, Proposed Action and Alternatives*, introduces planning concepts and provides information related to the development and analysis of the alternatives, including the No Action Alternative. Those alternatives considered but eliminated from further consideration are also identified. Chapter II concludes with a description of the alternatives that were selected for full environmental evaluation in chapter III, a description of the Preferred Alternative, and a table that summarizes the environmental impacts of viable alternatives retained for further analysis.
  - ☐ *Chapter III, Affected Environment and Environmental Consequences*, identifies the impacts that could occur to a wide array of resource areas with changes in the operation of the reservoir and gives particular attention to resources adversely affected. Each resource topic identifies the affected environment and potential environmental consequences (impacts).
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- ☐ *Chapter IV, Environmental Commitments and Mitigation Measures*, addresses environmental commitments and mitigation measures associated with modifying the operations of Navajo Dam.
  - ☐ *Chapter V, Consultation and Coordination*, presents a summary of the public involvement process, a listing of principal issues and concerns identified by the public, a summary of consultation and coordination activities, and the DEIS distribution list.
  - ☐ List of Preparers
  - ☐ Bibliography
  - ☐ Glossary
  - ☐ *Contents of Volume II* include:
    - A. Technical/Background Material
      - Flow Recommendations Report, Executive Summary
      - Hydrology data
      - Hydropower data
      - Water Quality Resource Report/Exceedences table
      - Limnology data
      - Socioeconomics – IMPLAN model output
    - B. Fish and Wildlife
      - Biological Assessment
      - Fish and Wildlife Coordination Act Report (to be included in FEIS)
      - Trout Health Assessment Report
      - Letter from SJRBRIP Biology Committee, dated February 21, 2002
      - Trout Habitat Suitability Assessment
  - ☐ *Contents of Volume III* in the FEIS will include:
    - Responses to DEIS Comments
-